

### REMARKS

Claims 1-37 are currently pending in the subject application and are presently under consideration. The Examiner is thanked for the courtesies extended during the telephonic interview related to the case on June 20, 2008. The main focus of the discussion rested on potential amendments to the claims to differentiate the claims from the overall state of the art. The interview was conducted with Ronald Krosky (Reg. No. 58,564), and Examiner Chih-Ching Chow but no agreement was reached. A version of all pending claims is presented on pages 2-6 of this Reply. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

#### **I. Rejection of Claims 1, 2, 5-16, 18, 21, and 23-28 Under 35 U.S.C. §102(b)**

Claims 1, 2, 5-16, 18, 21, and 23-28 stand rejected under 35 U.S.C. §102(b) as being anticipated by Knutson *et al.* (US 5,870,746). This rejection should be withdrawn for at least the following reason. Knutson *et al.* does not disclose or suggest all features set forth in the subject claims.

A single prior art reference anticipates a patent claim only if it ***expressly or inherently describes each and every limitation set forth in the patent claim.*** *Trintec Industries, Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The ***identical invention must be shown in as complete detail as is contained in the ... claim.*** *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

The claimed subject matter relates to an information agent system, application, and methodology wherein an information agent system, for instance, provides a platform for executing information agent applications. The information agent applications that are supplied can then be programmed, for example, by end-users and employed as end-user executive assistants or agents. Independent claim 1 recites: ***an accessor that based at least in part on a Nth order accessor constraint effectuates actions and conditions associated with the content of the folders across multiple domains via resolve or link values associated with two or more different executable applications, the Nth order***

*determined by a relationship to the end-user*, and independent claim 18 recites: *a facility that utilizes resolve or link values associated with disparate end-user programs to effectuate actions and conditions associated with the sections of data across a plurality of domains, the facility employs accessor constraints on an Nth order, the Nth order ascertained from an end-user perspective*. Knutson *et al.* does not disclose or suggest these features of applicants' claimed subject matter.

Knutson *et al.* discloses a system and method that allows a user to segment and partition a database based upon attributes associated with the data in the database. Further, Knutson *et al.* also provides a system and method for generating a report for a user which allows the user to make decisions without requiring the user to understand or interpret the data itself. The Office asserts that Knutson *et al.* provides the recited aspects at col. 1, lines 44-45, col. 28, lines 18-32, col. 29, lines 60-62, Figures 1-2, the Abstract, col. 2, lines 12-17, and col. 5, lines 31-35. Applicants' representative avers to the contrary. Knutson *et al.* provides at col. 1, lines 44-45 that automated tools that search data for trends or relationships can be considered discovery tools, and at col. 28, lines 18-32 Knutson *et al.* states that an automated interface consists of two tasks: user account setup and metadata builder. The user account setup dialog allows an administrator to create and manage user accounts, including login name, password, and user type, and the metadata builder allows the administrator to define dimensions, attributes, and basic measures, to create segments, map columns for time values, and define year types,. Additionally, Knutson *et al.* at col. 29, lines 60-62 discloses a manager windows interface that provides users access to all types of data stored by a manager subsystem such as folders, analyst, and Infoframe, as well as information about pending Infoframes.

Moreover, while the Abstract and col. 2, lines 12-17 state that Knutson *et al.* allows the user to define predetermined data types and to define relationships between the data types which allow users to generate reports and allow users to re-run sets of related reports over new data, and col. 51, lines 31-35 provides that a table can be used to join two attributes together to evaluate a dimensional query where a previous table is not sufficient to join all attributes in a dimensional query to a measure and the table can be searched to try to find a path of attributes that can be used to create multiple joins to

combine all attribute tables with all measure tables, it is submitted that the foregoing fails to rise to the full sufficiency recited in the subject claims.

In particular, applicants' representative submits that Knutson *et al.* is deficient in that it fails to disclose the fact that actions and conditions associated with the content of folders across multiple domains are actuated based at least in part on Nth order accessor constraints, the Nth order of the constraint being determined with respect to (e.g., from the perspective of) the end-user. More succinctly, Knutson *et al.* does not disclose the fact that the Nth ordering is ascertained by a relationship (e.g., familial and/or personal) with/to the end-user, rather Knutson *et al.* provides that the relationship is determined with respect to other data (e.g., tables) that are joined with one another. In Knutson *et al.* it is the data that provides the locus or basis from which the ordering is determined rather than the end-user, as is the case in applicants' claimed subject matter.

Moreover, Knutson *et al.* is further deficient in that it does not disclose multiple domains which, via resolve or link values associated with two or more different executable applications, effectuate the aforementioned actions and conditions associated with the content of the folders. Accordingly, in view of at least the foregoing, withdrawal of the rejection of independent claims 1 and 18 (and claims that depend there from) is respectfully requested.

## **II. Rejection of Claims 3 and 4 Under 35 U.S.C. §103(a)**

Claims 3 and 4 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* as applied to claim 1 above, and further in view of Bailey ("On-Event-Condition-Action language for XML"). This rejection should be withdrawn for at least the following reason. Claims 3 and 4 depend from independent claim 1; and Bailey fails to cure the aforementioned deficiencies of Knutson *et al.* with respect to independent claim 1. Accordingly, withdrawal of this rejection is respectfully requested.

## **III. Rejection of Claims 17 and 29 Under 35 U.S.C. §103(a)**

Claims 17 and 29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* as applied to claims 1 and 18 above respectively, and further in view of Ku *et al.* (US 6,532,471). This rejection should be withdrawn for at least the following

reason. Claims 17 and 29 depend from independent claims 1 and 18 respectively, and Ku *et al.* does not make up for the aforementioned deficiencies of Knutson *et al.* with respect to independent claims 1 and 18. Accordingly, withdrawal of the rejection with regard the subject claims is requested.

**IV. Rejection of Claims 19, 20, and 22 Under 35 U.S.C. §103(a)**

Claims 19, 20, and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* as applied to claim 1 and 18 above respectively, and further in view of Thuraisingham (US 5,481,700). Withdrawal of this rejection is requested for at least the following reasons. Claims 19, 20, and 22 depend from independent claim 18, and Thuraisingham does not remedy the deficiencies with respect to Knutson *et al.* with respect to the subject claims. Accordingly, this rejection should be withdrawn.

**V. Rejection of Claims 30-37 Under 35 U.S.C. §103(a)**

Claims 30-37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.*, Watters (US 6,490,718), and Saxe *et al.* (US 6,343,376). This rejection should be withdrawn for at least the following reasons. Knutson *et al.*, Watters, and Saxe *et al.*, alone or in combination, fail to teach or suggest all features set forth in the subject claims.

The rationale to support a conclusion that the claim would have been obvious is that *all the claimed elements were known in the prior art and one skilled in the art could have combined the elements as claimed by known methods with no change in their respective functions, and the combination yielded nothing more than predictable results to one of ordinary skill in the art.* KSR, 550 U.S. at \_\_\_, 82 USPQ2d at 1395; *Sakraida v. AG Pro, Inc.*, 425 U.S. 273, 282, 189 USPQ 449, 453 (1976); *Anderson's-Black Rock, Inc. v. Pavement Salvage Co.*, 396 U.S. 57, 62-63, 163 USPQ 673, 675 (1969); *Great Atlantic & P. Tea Co. v. Supermarket Equipment Corp.*, 340 U.S. 147, 152, 87 USPQ 303, 306 (1950) .... *If any of these findings cannot be made, then this rationale cannot be used to support a conclusion that the claim would have been obvious* to one of ordinary skill in the art.

Independent claim 30 recites: *user preferences based at least in part on a determination of an Nth order relationship between the one or more named groups of data and a user*. The combination of Knutson *et al.*, Watters, and Saxe *et al.* does not teach or suggest all aspects of the claimed matter.

As stated above with regard the rejection of independent claims 1 and 18, Knutson *et al.* does not teach or suggest Nth order relationships let alone user preferences being based at last in part on determination of Nth order relationships between named groups of data and users. Moreover, Watters and Saxe *et al.* are similarly deficient in this regard.

Watters provides a system and method for processing electronic data interchange information, and Saxe *et al.* discloses a system and method for increasing the speed of operation of a theorem prover relating to program verification using adaptive pattern matching techniques. However, both Watters and Saxe *et al.*, like Knutson *et al.*, do not disclose, teach or suggest user preferences that based on determinations of Nth order relationships between the one or more named groups of data and a user. In fact in none of the cited documents is there determination as to the Nth order relationships that users might have amongst themselves, let alone Nth order relationships that users might have with regard to named groups of data. Accordingly, for these reasons withdrawal of this rejection with respect to independent claim 30 and it associated dependent claims is requested.

**CONCLUSION**

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP545USB].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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